

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

Case No. 1:21-CR-271

MOHAMMED KHALIFA,

a/k/a,

Abu Ridwan Al-Kanadi

Abu Muthanna Al-Muhajir

Defendant.

STATEMENT OF FACTS

The United States and the defendant, MOHAMMED KHALIFA, a/k/a Abu Ridwan Al-Kanadi and Abu Muthanna Al-Muhajir (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following beyond a reasonable doubt with admissible and credible evidence:

*Defendant's Migration from Canada to Syria*

1. The defendant was born in the Kingdom of Saudi Arabia and moved to Canada from Italy with his family when he was five years of age. The defendant earned a degree in computer systems technology from a college in Toronto. The defendant is fluent in both English and Arabic.

2. In the Spring of 2013, the defendant began following reports of civil unrest in Syria. The defendant decided to travel to Syria after watching videos of the Assad regime advancing on Syrian villages occupied by opposition and Muslim populations. The defendant also listened to and watched jihadi audios and videos featuring American cleric Anwar Al-Awlaki. In particular,

the Al-Awlaki audio lecture series of the life of the prophet Muhammad motivated the defendant to travel to Syria.

3. The defendant traveled to Syria in August 2013, passing through Hatay, Turkey. On or about August 14, 2013, the defendant delivered an email message to a close relative, in which he stated the following, in part, “I told you ... that I’d be going to egypt (sic) but the truth is im in Syria. I came here to join the mujahideen fighting against Bashar and the Syrian army.” The defendant further explained in this email, “[I]n response, a number of prominent shaikhs from around the world held a conference in Cairo where they declared jihad and called on all Muslims to respond.”

4. On or about October 9, 2013, the defendant sent an email to a close relative, in which he stated the following, in part, “I came here to fight jihad not just to defend Syrians, but because it’s an obligation to fight the tyrants, remove them from power and establish the Shariah, all with the aim of re-establishing the Islamic caliphate. Jihad is the pinnacle of Islam, and there are many hadeeth to that effect, so there’s nothing more honourable than serving Islam through it. ...” The defendant concluded this email by attaching a link to a lecture by “Shaikh” Anwar Al-Awlaki.

5. The defendant joined the Muhajireen Wal-Ansar (MWA) Battalion soon after entering Syria. MWA subsequently gave Bay’ah (*i.e.*, pledged allegiance) to the Islamic State of Iraq and al-Sham (“ISIS”), a designated foreign terrorist organization. At the time the defendant joined, MWA was led by Abu Umar al-Shishani, who would become a leading ISIS military commander.

6. The defendant received basic military training with MWA when he was located in the Aleppo (Syria) countryside. At the end of 2013, the defendant participated in fighting against

the Syrian regime in a village in Tal Hasil in the Aleppo countryside. The defendant swore allegiance to then-ISIS leader Abu Bakr al-Baghdadi and joined ISIS in or around November 2013. The defendant swore allegiance to al-Baghdadi and ISIS again in or around June 2014, when the worldwide caliphate was announced.

***Defendant Joins the ISIS Media Bureau***

7. In early 2014, the defendant was recruited to join ISIS's media department due in part to his language abilities as a fluent English and Arabic speaker. ISIS maintained a centralized media production under a single command structure consisting of various media centers. This central command structure, under which the various media centers operate, is generally referred to as the "Central Media Bureau" or the "Diwan of Media." As part of the ISIS media operation, the defendant worked with al-Furqan and al-Hayat, and assisted in preparing and producing products created and distributed by al-Furqan and al-Hayat. The defendant worked within the ISIS media operation until late 2018.

8. During his time working in the ISIS media operation, the defendant narrated an ISIS video entitled "The Structure of the Khilafah." ISIS distributed this video on or about July 6, 2016, through the al-Furqan Media Center. "The Structure of the Khilafah" provided detailed information and visual graphics of ISIS's internal organization, explaining how ISIS divided responsibility and governed its territory. In the video, the defendant narrated information about the structure of ISIS having thirty-five "wilayat," nineteen of which were in Iraq and Syria and sixteen of which were located outside Iraq and Syria. In the video, the defendant also narrated information about ISIS's media apparatus, noting its centralized framework. Additionally, the defendant narrated information about ISIS as having fourteen "dawawin," one of which is the "Diwan of Media" or Central Media Bureau. The defendant narrated information about the

Central Media Bureau as “the body responsible for any content released by the Islamic State, whether that content is audio, visual or written.” The video portrays a graphic depicting the various brands of the “Diwan of Media” to include: al-Furqan, al-Hayat, Ajnad, Bayan Broadcasting, al-Himmah and al-Naba.

9. The al-Hayat Media Center produced and distributed a range of English-language videos including a series titled “Inside the Khilafah” between approximately July 28, 2017 and October 30, 2018. The defendant narrated and provided translations for approximately 15 ISIS videos, which included the “Inside the Khilafah” series. Over the course of eight “Inside the Khilafah” videos, al-Hayat attempted to depict various aspects of daily life within the Islamic State and featured ISIS members encouraging potential recruits to join ISIS and commit to jihad.

10. In addition to serving as a translator and narrator for al-Hayat and al-Furqan, the defendant also oversaw the translation of official ISIS media content and provided general oversight as well as instruction to ISIS supporters on behalf of ISIS's Central Media Bureau. Because of the amount of content released by ISIS from 2016 onward, the defendant and other ISIS media members directed various supporter networks for production and dissemination of ISIS media. These supporter networks were groups of individuals who provided support to ISIS but were not necessarily geographically located in Syria or Iraq. These supporters would assist in the translation of official ISIS media publications into various languages, including, but not limited to, English. The defendant’s oversight facilitated the translation and distribution of ISIS-produced media content, released under various ISIS media brands such as “Nashir” and “Amaq News Agency,” in order to reach Western audiences.

***Defendant Discusses ISIS Violence***

11. In a series of Gmail chats on September 24, 2014, the defendant wrote:



Kafir journalists have no covenant. Without a covenant ur blood is halal. Being a civilian or journo or aid worker means nothing in the shariah. A kafir is a kafir. 2. FSA ive already explained. 3. Prisoners of war that are kuffar can be dealth (sic) with in three ways per the quran .... free them, ransom them, or execute them.

At the time the defendant wrote this in a series of Gmail chats, ISIS was conducting a hostage taking and ransom demand campaign involving foreign citizens including American, British, and European journalists and aid workers. Between August 19, 2014 and February 6, 2015, ISIS killed eight American, British or Japanese citizens in Syria as part of the hostage scheme.

12. In another Gmail chat on September 24, 2014, the defendant chastised the Free Syrian army for working with America.

13. In the same series of September 24, 2014, Gmail chats, the defendant stated, “as far as killing amd (sic) takfeer goes, we don’t shy away from making takfeer of those who deserve it ...” as part of a dialogue concerning ISIS committing executions.

***“Flames of War: Fighting Has Just Begun”***

14. The defendant narrated a 55 minute and 13 second ISIS propaganda video titled “*Flames of War: Fighting Has Just Begun*,” distributed on September 19, 2014, by the al-Hayat Media Center. The video, narrated throughout by the defendant in English, is a documentary-style production portraying battle scenes of ISIS members conducting attacks in Syria in or around mid-2014. The video glamorizes ISIS and lauds its fighters. In the video, there was direct communication to the United States in Arabic by Abu Bakr al-Baghdadi, saying “Finally, this is a message we direct to America. Know, O defender of the cross, that a proxy war won’t help you in Sham just as it didn’t help you in Iraq. As for the near future, you will be forced into direct confrontation, with Allah’s permission, despite your reluctance. And the sons of Islam have prepared themselves for this day, so wait and see, for we too are also going to wait and see.” An English language translation of al-Baghdadi’s words was presented in subtitles on the screen.

15. A primary focus of the video is ISIS's capture of the Syrian Arab Army (SAA) Division 17 base in or around July 2014. The final sequence of the video depicts captured Syrians from the Division 17 base digging a trench under an ISIS flag. The defendant narrates this final scene on camera while masked. The defendant describes to the camera the men below him as "soldiers of Bashar," a reference to SAA soldiers and Syrian President Bashar al-Assad, who are "digging their own graves." This image depicts the defendant in camouflage military-style uniform as he appears in the final scene of *"Flames of War: Fighting Has Just Begun"*:



16. In this last sequence of the video, the defendant is seen executing a kneeling Syrian soldier by shooting him in the back of the head with a handgun. The Syrian soldier falls into a ditch, alongside other Syrian soldiers who were simultaneously executed by other ISIS foreign fighters.

***"Flames of War II: Until the Final Hour"***

17. The defendant narrated a 58 minute and 8 second ISIS propaganda video titled



*"Flames of War II: Until the Final Hour,"* distributed on November 29, 2017, by the al-Hayat Media Center. The video, narrated throughout by the defendant in English, opens with scenes of war including bombings and destruction juxtaposed with statements made by U.S. Presidents. The defendant states in the narration, "They [the US-led coalition] failed. Terror, its fuel is war. As the ravenous flames continue to rise making their way to the lands of the crusaders." During this narration, the video depicts scenes of ISIS attacks in the West. Additionally, the video depicts a map of the United States with flames superimposed over the map. Five areas are identified on the map: San Bernardino, California; Las Vegas, Nevada; Texas; Orlando, Florida; and New York, New York. These locations all experienced acts of terrorism that were later praised by ISIS.

18. On this video, the defendant stated, "And as Allah continued to alternate the outcomes of battles, the creed of the victorious group remained constant. They [ISIS fighters] would not seek to live to fight another day. Rather, they fought to kill and to be killed. For it is through death that this young Khilafah lives. Through death it remains forever victorious until the final hour." The defendant's narration is juxtaposed with scenes of fighting and violence. The video threatens the United States when an Arabic speaking individual, whom the video indicates is now-deceased ISIS spokesman Shaykh Abul-Hasan al-Muhajir, says in Arabic "so die in your rage America, die in your rage."

19. The last scene of *"Flames of War II: Until the Final Hour,"* depicts the masked defendant speaking to the camera while standing over what appear to be captured Syrian soldiers digging a hole over which flies an ISIS flag. The defendant executes another kneeling Syrian soldier by shooting him in the back of the head with a handgun, while other masked ISIS members follow suit and shoot the prisoners kneeling in front of each of them in the back of the head. These prisoners then fall forward into the trench where they lie motionless. This image depicts the

defendant as he appears in the final scene of *"Flames of War II: Until the Final Hour"*:



### *The Defendant's Capture*

20. In January 2019, the defendant left media operations and elected to engage in fighting. The defendant attacked a Syrian Democratic Forces ("SDF") position in Abu Badran, Syria. The defendant, alone and armed with three grenades and an AK-47, threw a grenade on the roof of a house where SDF soldiers were standing. The grenade detonated and the defendant ran into the house and attempted to go to the roof, but an SDF soldier was firing from the stairs. The defendant began firing at the SDF soldier and attempted to use all three of his grenades during the attack. The defendant fired most of his ammunition during the assault before his AK-47 jammed. The defendant was unable to clear his weapon. The defendant received shrapnel injuries to his left leg, right leg, left arm and other parts of his body during the firefight. The defendant surrendered to the SDF on or about January 13, 2019. The SDF transferred the defendant's custody to the United States on or about September 30, 2021, and the defendant was



brought to the Eastern District of Virginia on or about October 1, 2021.

*Conclusion*

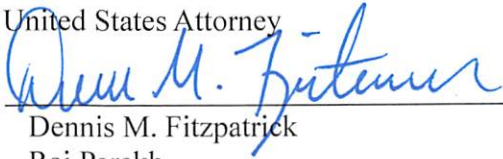
21. This Statement of Facts includes those facts necessary to support the Plea Agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

22. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

JESSICA D. ABER  
United States Attorney

By:

  
Dennis M. Fitzpatrick  
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U.S. Department of Justice

After consulting with my attorneys and pursuant to the plea agreement entered into this day between the defendant, MOHAMMED KHALIFA a/k/a Abu Ridwan Al-Kanadi and Abu Muthanna Al-Muhajir, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
MOHAMMED KHALIFA

Date: 12/10/2021

We, the undersigned, are defendant's attorneys. We have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Cary Citronberg  
Edward J. Ungvarsky  
Counsel for Mohammed Khalifa

Date: 12/10/2021